

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
CA No. 5:23-CV-00683-FL

LEO J. EDWARDS, on behalf of himself and )  
all others similarly situated, )  
 )  
 *Plaintiff,* )  
 )  
 v. )  
 )  
 CITY OF RALEIGH, )  
 )  
 *Defendant.* )  
\_\_\_\_\_ )

**JOINT STIPULATION OF DISMISSAL OF CLAIMS WITH PREJUDICE**  
**CONCERNING ONLY OPT-IN PLAINTIFF THEODORE ALLEN PLACE**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Opt-In Plaintiff Theodore Allen Place and Defendant, by and through their respective counsel, hereby jointly stipulate to the dismissal with prejudice of all of Opt-In Plaintiff's claims and causes of action in the above-styled case, in their entirety, with each party to bear his or its own costs and attorney's fees, specifically relating to Opt-In Plaintiff's participation in this matter.

Respectfully submitted this May 13, 2025.

/s/ Gilda A. Hernandez  
Gilda A. Hernandez (NCSB No. 36812)  
Hannah B. Simmons (NCSB No. 59579)  
Matthew S. Marlowe (NCSB No. 60035)  
**THE LAW OFFICES OF GILDA A.  
HERNANDEZ, PLLC**  
1020 Southhill Drive, Suite 130  
Cary, NC 27513  
Tel: (919) 741-8693  
Fax: (919) 869-1853  
ghernandez@gildahernandezlaw.com  
hsimmons@gildahernandezlaw.com  
mmarlowe@gildahernandezlaw.com  
*Attorneys for Plaintiffs*

/s/ Alice Tejada  
Alice Tejada  
Senior Associate City Attorney  
P.O. Box 590, Raleigh, NC 27602  
Tel: (919) 996-2004  
State Bar No. 23909  
Alice.Tejada@raleighnc.gov  
  
Mollie A. Grose  
Senior Associate City Attorney  
P.O. Box 590, Raleigh, NC 27602  
Tel: (919) 996-6560  
State Bar No. 60900  
Mollie.Grose@raleighnc.gov  
*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 13, 2025, the foregoing **JOINT STIPULATION OF DISMISSAL OF CLAIMS WITH PREJUDICE CONCERNING ONLY OPT-IN PLAINTIFF THEODORE ALLEN PLACE** was delivered via the CM/ECF system to the following:

Alice Tejada  
Senior Associate City Attorney  
P.O. Box 590  
Raleigh, NC 27602  
Tel: (919) 996-2004  
State Bar No. 23909  
Alice.Tejada@raleighnc.gov

Mollie A. Grose  
Senior Associate City Attorney  
P.O. Box 590  
Raleigh, NC 27602  
Tel. (919) 996-6560  
State Bar No. 60900  
Mollie.Grose@raleighnc.gov

*Attorneys for Defendant*

/s/ Gilda A. Hernandez  
Gilda A. Hernandez (NCSB No. 36812)  
Hannah B. Simmons (NCSB No. 59579)  
Matthew S. Marlowe (NCSB No. 60035)  
**THE LAW OFFICES OF GILDA A.  
HERNANDEZ, PLLC**  
1020 Southhill Drive, Suite 130  
Cary, NC 27513  
Tel: (919) 741-8693  
Fax: (919) 869-1853  
ghernandez@gildahernandezlaw.com  
hsimmons@gildahernandezlaw.com  
mmarlowe@gildahernandezlaw.com

*Attorneys for Plaintiffs*